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10 **UNITED STATES DISTRICT COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12 DAN CARLTON, an individual,
13 Plaintiff,
14 v.
15 AMGUARD INSURANCE COMPANY, a
foreign corporation; and
DOES 1 to 100, inclusive,
16 Defendants.

Case No. 2:22-cv-02030-WBS-DB

**AMENDED STIPULATION AND ORDER TO
EXTEND DISCOVERY, PRETRIAL DATES
AND TRIAL DATE SET IN STATUS
(PRETRIAL SCHEDULING) ORDER**

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18 Plaintiff Dan Carlton ("Plaintiff") and Defendant Amgard
19 Insurance Company ("Defendant") by and through their respective
20 counsel, hereby stipulate and request the Court to approve their
21 agreement for an extension of the discovery, other pretrial
22 deadlines and trial date as follows by approximately 60 days:

23 1. On March 3, 2023, the Court issued a Status (Pretrial Scheduling)
24 Conference and trial [Dkt. 7].

25 2. Good cause exists for the parties' request because the
26 parties would like to engage in both informal settlement
27 discussions and a possible mediation to attempt to resolve this
28 matter before engaging in further discovery. The parties have

completed disclosures, and plaintiff's counsel has noticed the depositions of multiple home office employees of the defendant.

3. In light of the settlement discussions, the discovery to be completed and possible dispositive motions, the parties jointly request that the Court extend the deadlines and dates as proposed below:

Deadline	Current Date	Proposed New Date
Expert disclosures due	September 5, 2023	November 6, 2023
Rebuttal expert disclosures	September 27, 2023	November 27, 2023
Close of factual discovery	October 17, 2023	December 18, 2023
Last day to file motions	November 13, 2023	February 13, 2024
Final Pretrial Conference	January 29, 2024, 1:30 p.m.	April 22, 2024, 1:30 p.m.
Trial Date	March 26, 2024, 9 a.m.	June 25, 2024, 9:00 a.m.

4. Accordingly, the parties stipulate and respectfully request that the Court extend the deadlines as proposed, or alternative dates convenient for the Court.

Dated: August 2, 2023

WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP

/s/

By: _____
JOHN H. PODESTA
LINDA B. OLIVER
Attorneys for Defendant
AMGUARD INSURANCE COMPANY

Dated: August 2, 2023

MURPHY AUSTIN ADAMS SCHOENFELD LLP

By

ALEXANDER F. STUART
Attorneys for Plaintiff
DAN CARLTON

ORDER

After considering the stipulation, IT IS HEREBY ORDERED
THAT:

1. For good cause shown, the stipulation is granted;
2. The discovery, motion, pretrial and trial dates are
continued as follows:

Expert disclosures due: November 16, 2023

Rebuttal expert disclosures due: November 27, 2023


Close of factual discovery: December 18, 2023

Last day for filing motions: February 13, 2024

Final Pretrial Conference: **April 22, 2024, 1:30 p.m.**

Trial date: **June 25, 2024, 9:00 a.m.**

Dated: August 3, 2023


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE